

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

REENA S. MATHEW,  
Plaintiff

v.

SANTANDER CONSUMER USA INC.,  
Defendant

§  
§  
§  
§  
§  
§  
§

Civil Action No. 3:23-cv-01494-N

**REPLY IN SUPPORT OF PLAINTIFF'S MOTION  
TO CONSIDER DOCUMENT FILED OUT OF TIME**

Plaintiff Reena S. Mathew submits this reply to the arguments raised in Defendant's Response to Plaintiff's Motion to Consider Document Filed Out of Time.

**30(b)(6) Topic 5: Performance Review Scores**

Defendant's response misses the point of Plaintiff's Motion to Compel (Doc. 40). The motion to compel seeks to compel disclosure of information (performance review scores), not documents (the performance reviews). This Court previously ordered production of the performance review documents by order dated June 17, 2024, and the issue now is whether Defendant is withholding the performance review scores.

Defendant's 30(b)(6) witness on this topic was unprepared, so there is good cause to modify the scheduling order and consider Plaintiff's second motion to compel filed on September 27, 2024.

**30(b)(6) Topic 7: Preservation of Evidence**

Defendant's Response does not address this issue. Defendant's 30(b)(6) witness on topic 7 was unprepared, so there is good cause to modify the scheduling order and consider Plaintiff's second motion to compel filed on September 27, 2024.

WHEREFORE, Plaintiff requests an order granting her motion.

Respectfully submitted,

/s/ Donald E. Uloth  
Donald E. Uloth  
Texas Bar No. 20374200  
Law Office of Donald E. Uloth  
18208 Preston Road, Suite D-9 # 261  
Dallas, Texas 75252  
Phone: (214) 989-4396  
Fax: (972) 777-6951  
Email: [don.uloth@uloth.pro](mailto:don.uloth@uloth.pro)  
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on October 25, 2024 I am filing this motion electronically using the Court's ECF filing system, which will email a file-marked copy of this motion to all counsel of record.

/s/ Donald E. Uloth  
Donald E. Uloth